



articulated in Mr. Simon's Opposition to Defendants' Motion to Compel, these subpoenas to the USC Employees should be quashed.

Moreover, Defendant Abdelaziz's decision to subpoena three different witnesses to admit the same two documents is duplicative, abusive, and harassing. This is particularly true given that Defendant Abdelaziz served Ms. Shapiro, an executive assistant at USC with absolutely nothing to do with this matter, in person without any prior warning or communication with USC, even though: (1) USC has accepted service for all other named USC employees on whom Defendants have requested to serve subpoenas; and (2) USC requested Defendants go through USC's outside counsel if they wished to subpoena specific USC employees. Defendant Abdelaziz's actions are unnecessary and inappropriate.

Respectfully submitted,

UNIVERSITY OF SOUTHERN CALIFORNIA,

By its attorneys,

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**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on September 29, 2021.

/s/ Anthony E. Fuller

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